

# Public Schools of North Carolina

## **Welcome Back**

## Day 1 Agenda April 27, 2021 (PM)

- 21<sup>st</sup> CCLC Statewide Evaluation Results
   & Program Evaluation Activities Part II
- NCDPI Financial Business
   Services/Monitoring and Compliance
   Updates
- 2021 Close-Out Procedures Reminders
   & Day 2 Overview



# Beth Thrift Program Specialist SERVE Center at UNC-G



### **Kathleen Mooney**

Program Evaluator SERVE Center at UNC-G

### Public Schools of North Carolina

# 21<sup>st</sup> Century Community Learning Centers North Carolina Out-of-School-Time Program Quality Self-Assessment

2020-2021 Virtual Statewide Technical Assistance Meeting
April 27, 2021
Afternoon Session

**Kathleen Mooney**, Evaluation Specialist, SERVE Center at UNCG **Beth Thrift**, Program Specialist, SERVE Center at UNCG



### Agenda

- NC 21<sup>st</sup> CCLC Program Quality Self-Assessment History
- Eight Quality Standards
- Rating Program Quality
- Reviewing Results
- Asking Questions about the Data
- Creating an Action Plan
- FAQs
- Sharing Benefits/Challenges of Self-Assessment Process



## What is quality?

### What is quality?

 Quality involves identifying a high standard and demonstrating that your program meets that standard.



#### BACKGROUND

Based on the thinking and experience of out-of-school-time providers, researchers, and other professionals, in North Carolina and across the country, the North Carolina Center for Afterschool Programs (NC CAP) set forth to determine what high quality out-of-school-time programs have in common. Thus, NC CAP developed and made available a set of quality standards for these programs. In 2017, SERVE Center at the University of North Carolina at Greensboro, in collaboration with the Federal Program Monitoring and Support Division at NCDPI, used the NC CAP self-assessment tool as a starting point to revise and develop a more streamlined and accessible approach for 21st Century Community Learning Centers (CCLC) programs to use in internal reviews of their program quality.

This self-assessment format is intended to facilitate the work of program directors in their organizational reviews and planning around the continuous improvement of program

quality. That is, the program selfassessment format is designed to engage program leaders in thoughtful discussions with stakeholders, including internal staff, about how to identify areas of strength and improve other areas that may need attention. It includes questions under

The Program Self-Assessment format is designed to engage program leaders in thoughtful discussions about how to identify areas of strength and improve other areas that may need attention.

 $eight \ broad-based \ quality \ standards, \ reflecting \ features \ of \ a \ high \ quality \ out-of-school-time \ program.$ 

The instrument is not meant to be used for external judging of a program as "good" or "bad" but rather, is intended for program leaders' use in identifying programmatic practices and processes that could be improved.

# NC 21<sup>st</sup> CCLC Program Quality Self-Assessment History

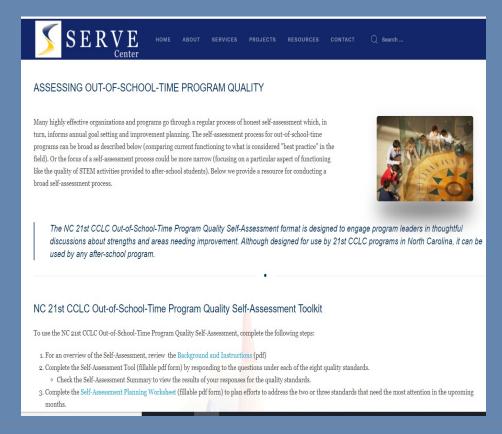


NC CAP developed a set of quality standards to guide programs based on what high-quality programs across the country have in common. The standards focused on eight areas, including employing qualified staff, emphasizing positive relationship building, establishing partnerships, and providing students with intentional activities that support their academic and personal growth. In 2017, the SERVE Center at the University of North Carolina at Greensboro adapted the standards to serve as the framework for the NC 21st CCLC Out-of-School-Time Program Quality Self-Assessment.

America After 3PM: Top 10 States for Afterschool Report (December 2020)



https://www.dpi.nc.gov/districtsschools/federal-programmonitoring/21st-centurycommunity-learning-centers/cclcresources/



https://serve.uncg.edu/21st-cclc/program-quality/

# Eight NC 21<sup>st</sup> CCLC Out-of-School-Time Quality Standards

Standard #	Quality Program Standards
Standard #1	Provide students with a safe environment
Standard #2	Recruit, hire, train, and retain a qualified staff
Standard #3	Help students learn in different environments
Standard #4	Develop and maintain student attendance processes that are clear and effective
Standard #5	Develop and maintain positive relationships between students and staff
Standard #6	Establish and maintain effective partnerships with families, businesses, and communities
Standard #7	Provide students with activities and opportunities that support their academic development
Standard #8	Provide students with enrichment activities and opportunities that support academic and personal growth

#### **Out-of-School-Time Program Quality Self-Assessment Tool**



Quality Standard #1: Provide Students with a Safe Environment

#### Does the out-of-school

- 1) have an environment t learning activities?
- 2) have written and appro with students and their
- 3) train all staff on writter
- 4) comply with state-requ safety and fire drills?
- 5) maintain all requisite d
- 6) maintain accurate and
- emergency information 7) maintain a regular sche
- parents, and students? 8) have effective procedu

10) serve at least one nutri

disabilities as per the A

- transitions (e.g., way to procedures?
- 9) ensure safe transportafield trips (as needed)?
- 7) have a staff o 11) have written guidance

Quality Standard #2: Recruit, Hire, and Retain a Qualified Staff

#### Does the out-o

- 1) have a safe at
- 2) conduct back
- 3) consider the
- 4) employ prog
- 5) maintain an e
- 6) hold regular:
- scope of the
- 8) assess the de
- 9) offer staff tra positive relat

Does the o

1) have a v

2) maintai

families

utilize a

#### Does the out-

- 1) offer opport learning)?
- offer opport
- to-peer acti 3) offer learning
- offer service students)?
- offer activit
  - attenda

3) clearly o

- use atte delivery

#### Quality Standard #3: Help Students Learn in Different Environments

Does the ou

have write

for respe

feedback

foster col

for progr

responsi

systemat

have staf

#### Quality Standard #4: Develop and Maintain Student Attendance Processes that are Clear and Effective

Does the out-of

computer ha

offer instruct

students?

offer instruct

Quality Standard #5: Develop and Maintain Positive Relationships Between Students and Staff

Quality Standard #6: Establish and Maintain Effective Partnerships with Families, Businesses, and Communities

#### Does the out-of-

- 1) have a plan fo 2) supports
  - 2) maintain an e
    - schools, busin
    - 3) offer educatio
    - 2) offer grade-le learning (e.g. 4) collect feedba stakeholders make availab
    - 5) have establish activities and
    - 6) offer parents
    - 7) offer staff trai and/or school
    - 8) have a parent,

#### Quality Standard #7: Provide Students with Activities and Opportunities that Support their Academic Development

#### Quality Standard #8: Provide Students with Enrichment Activities and Opportunities

#### that Support Academic and Personal Growth

- 1) have an effect (e.g., principa In Does the out-of-school-time program... Yes Progress No
  - 1) offer students academic skill-building activities to manage day-to-day responsibilities including homework, studying, note-taking, etc.?

**North Carolina** 21st Century

**Learning Centers** 

afterschool programs

Soaring Beyond Expectations
afterschool pro-

Community

- 2) offer students youth development activities that foster responsible-decision making skills and coping strategies? include activities related to life skill development (e.g., financial literacy,
- health and wellness)? 4) offer activities for students to engage in service learning, internships, or
- offer opportunities for students to make choices among activities based on
- 6) offer opportunities to help students develop confidence in their abilities?
  - Enter Total #s Checked "Yes", "In Progress", and "No"

Use the space below to add any notes regarding Quality Standard #8



### **Anatomy of a Quality Standard**

- Quality Standard
- Supporting Quality Indicators
- Current Implementation Status
- Total Count Section
- Notes Section

		**	In	
Joe	s the out-of-school-time program	Yes	Progress	No
	have written guidance, with staff training, on student and staff expectations for respectful behaviors during out-of-school time?			
	support staff in developing positive student relationships (e.g., training, feedback, resources)?			
•	foster collaboration between students and staff in setting clear expectations for program behavior (e.g., encourage mutual respect, listening and responsiveness between staff and students)?			
4)	systematically monitor and offer feedback on student behavior?			
5)	have staff that models expected behavior for students?			
	Enter Total #s Checked "Yes", "In Progress", and "No"			

Quality Standard #5: Develop and Maintain Positive Relationships Between Students

### **Program Scenario**

High-quality
Youth
Programming &
Opportunities
That
Heighten
Educational
Trajectories
In the
Carolinas for
All
Learners



## **Rating Program Quality**

Do	es the out-of-school-time program	Yes	In Progress	No
	have written guidance, with staff training, on student and staff expectations for respectful behaviors during out-of-school time?		☑∕	
2)	support staff in developing positive student relationships (e.g., training, feedback, resources)?	$\square$		
3)	foster collaboration between students and staff in setting clear expectations for program behavior (e.g., encourage mutual respect, listening and responsiveness between staff and students)?			
4)	systematically monitor and offer feedback on student behavior?			$\checkmark$
5)	have staff that models expected behavior for students?	$\checkmark$		
	Enter Total #s Checked "Yes", "In Progress", and "No"	3	1	1
Us	e the space below to add any notes regarding Quality Standard #5			
St	are a leader in this area: aff and participant interactions are positive and participant input in to planning for program activities. Participants are given a significa nd expectaions. (5.3)			
-Up	need slight changes: odating staff, student, and parent handbooks to incorporate expect uring the afterschool program. (5.1)	ations for	respectful online	e behav
Ne Co	need significant improvement in this area: eed to articulate a formal "systematic" process for monitoring and c onsider conducting an evaluation at least once every two years usi aff-to-youth interactions and review our current rules and routines.	ng an outs	ide observer to	measur

and supportive training will be planned with staff based on results. (5.4)

## Whole Group Activity

0	es the out-of-school-time program	Yes	In Progress	No
.)	offer opportunities for active or independent learning (e.g., project-based learning)?			
-	offer opportunities for group-based activities, peer mentoring, or other peer-to-peer activities?			
3)	offer learning activities off the program site?			
4)	offer service activities, community-based projects, or internships (for older students)?			
5)	offer activities that stimulate interest in the community?			
	Enter Total #s Checked "Yes", "In Progress", and "No"			

### **Reviewing Results**

### For each Standard:

- Calculate:
  - Total # of "Yes"
  - Total # of "In Progress"
  - Total # of "No"

### Self-Assessment Summary



In the table below, enter the total number of times "Yes", "In Progress", and "No", were selected under each of the eight quality standards.

Quality Standard	Total # "Yes"	Total # "In Progress"	Total # "No"	
Quality Standard #1: Provide students with a safe environment. (11 questions)	5	2	4	
Quality Standard #2: Recruit, hire, train, and retain a qualified staff. (9 questions)	6	3	0	
Quality Standard #3: Help students learn in different environments. (5 questions)	2	2	1	
Quality Standard #4: Develop and maintain student attendance processes that are clear and effective. (5 questions)	5	0	0	
Quality Standard #5: Develop and maintain positive relationships between students and staff. (5 questions)	3	1	1	
Quality Standard #6: Establish and maintain strong partnerships with families, businesses, and communities. (8 questions)	6	2	0	
Quality Standard #7: Provide students with activities and opportunities that support their academic development. (5 questions)	1	0	4	
Quality Standard #8: Provide students with enrichment activities and opportunities that support academic and personal growth. (6 questions)	2	2	2	

Looking at the totals where "In Progress" or "No" was checked for each quality standard, identify those top two or three standards believed to be most in need of attention going forward.

### **Reviewing Results**

### For each Standard:

- Calculate:
  - Total # of "Yes"
  - Total # of "In Progress"
  - Total # of "No"
- Look at average:
  - Standard 1: "No" = 4 (36%)
  - Standard 7: "No" = 4 (80%)

### Self-Assessment Summary



In the table below, enter the total number of times "Yes", "In Progress", and "No", were selected under each of the eight quality standards.

Total # "Yes"			Total # "No"
5 (46	%)	2 (18%)	4 (36%)
6 (67	%)	3 (33%)	0 (0%)
2 (40)	%)	2 (40%)	1 (20%)
5 (10	0%)	0 (0%)	0 (0%)
3 (60	%)	1 (20%)	1 (20%)
6 (75	%)	2 (25%)	0 (0%)
1 (20	%)	0 (0%)	4 (80%)
2 (33	(%)	2 (33%)	2 (33%)
	"Yes" 5 (46' 6 (67' 2 (40' 5 (10) 3 (60' 6 (75) 1 (20'		"Yes" Progress" 5 (46%) 2 (18%) 6 (67%) 3 (33%) 2 (40%) 2 (40%) 5 (100%) 0 (0%) 3 (60%) 1 (20%) 6 (75%) 2 (25%) 1 (20%) 0 (0%)

Looking at the totals where "In Progress" or "No" was checked for each quality standard, identify those top two or three standards believed to be most in need of attention going forward.

# Asking Questions about the Data



- Which standards have the highest % ratings of "Yes"?
- Which standards have the highest % ratings of "In progress"?
- Which standards have the highest % ratings of "No"?
- Are there any standards that were higher or lower than anticipated?

## **Creating an Action Plan**

### **Self-Assessment Planning Worksheet** The following table may be useful in thinking through next steps regarding the top two or three priority standards believed to be most in need of attention going forward. Name of Quality Areas Most in Next Person Timeline/ Steps Responsible Milestones Standard **Need of Attention**

## Whole Group Activity

### **Self-Assessment Planning Worksheet**

The following table may be useful in thinking through next steps regarding the top two or three priority standards believed to be most in need of attention going forward.

# Frequently Asked Questions (FAQs)



- With Cohorts 12 and 13 near the end of their funding cycle, is there benefit for them to use the selfassessment tool?
- When should my program collect self-assessment data?
- Should my program assess all standards at one time?
- Who should participate in the self-assessment process?
- What is the best way to gather self-assessment data?

### Things to Consider



### Checklist:

- ✓ What is your overarching purpose?
- ✓ Who will lead the entire process?
- ✓ Which stakeholders will be involved?
- ✓ When to conduct?
- ✓ How will self-assessment data be gathered?
- ✓ What discussions will be needed about the findings?
- ✓ How will you document next steps to program improvement?
- ✓ How will you monitor your progress?

### **Proposed Changes?**

What is the current quality implementation level of your program?

- Level 1: We need significant support/improvement
- Level 2: We need some support/improvement
- Level 3: We can demonstrate this in observable ways
- Level 4: We are a leader in this area

How urgent a need is it for your program to address?

- Very Urgent (e.g., right now)
- Urgent (e.g., this year)
- Somewhat urgent (e.g., next year)
- Not Urgent (e.g., before the end of the grant)

Low Imp. Level/

Urgent need for change

High Imp. Level/

Urgent need for change

Low Imp. Level/

No urgent need for change

High Imp. Level/

No urgent need for change

# **Sharing Benefits/Challenges** of Self-Assessment Process



## Questions



### **Contact Information**

Kathleen Mooney

kmooney@serve.org



# Public Schools of North Carolina

# **NCDPI Financial Business Services**



### John Keefer

Public School Budget Manager, NCDPI Division of School Business



# Public Schools of North Carolina

# 21st CCLC Allotments

### Allotment Process Overview

- Funding allotments managed by School Allotments Section within School Business
- Revisions Allotments are processed through "revisions" within DPI Allotment System
- Revisions include allotments for multiple funding sources
- Standard internal control process for each revision
- Distribution of roles and responsibilities across School Allotments section
- Multiple levels of review and approval
- Federal Allotment Process: Approval→Preparation→Review→ Upload→Issuance

### Allotment Process Timeline

- Standard" timeline for processing allotments is 7-10 Business Days
- •During certain times of the year, that can be longer (3 weeks or longer):

December/Holidays

February-March

June-July

- School Allotments does not have access to CCIP Formal notice of approval must be received from Federal Programs Monitoring and Support
- •Once allotment is issued in Allotment System, there is still a processing time before funds are available for draw in NCAS and ERaCA

### 21st CCLC Allotment Process

- Application and Budget are approved in CCIP by Federal Programs
- Notice of approval and award amounts provided by Federal Programs to School Business
- PRC 110 Allotment File for FY XX is created to capture full year funding
- Three Installments are calculated (34%, 34%, 32%) based on full year amount
- First installment allotted when initial approval is provided→ second and third installments also made when Federal Programs provides approval to allot the installment



# Public Schools of North Carolina

## **Indirect Costs**

### Indirect Costs vs. Direct Costs

- An indirect cost is a cost incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to results achieved. (2 C.F.R. 200.1)
- Direct costs are those costs that be identified specifically with a particular final cost objective, such as a Federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. (2 C.F.R. 200.413(a))
- Identification with Federal awards rather than the nature of the cost involved is the determining factor in distinguishing direct from indirect costs. (2 C.F.R. 200.413(b)).

## Key Factor – Consistency

- There is <u>no universal rule</u> for classifying costs as direct or indirect under every Federal award.
- •What is essential? Each item of cost incurred for the same purpose is consistently treated as either a direct or indirect cost. (2 C.F.R. 200.412)
- Avoids possible double charging of Federal awards
- Do not change back and forth between direct and indirect for same items of cost
- Costs should be 100% direct or 100% indirect -- do not mix!

# Charging Indirect Costs

- •Indirect cost rate is the rate at which an organization can charge indirect costs based on the direct costs charged to a grant (minus excluded costs)
- •Indirect costs = (Indirect cost rate) x (Total Direct Costs minus Capital Outlays incl. Capitalized Equip., Subgrants/Contracts, and other "distorting" or unallowable items)
- •Example:

Indirect Cost Rate	3.5%
Total Direct Costs	\$100,000
Contracts	\$20,000
Capitalized Equipment	\$5,000
Total Allowable Indirect Costs	\$2,625 (\$75,000 x 3.5%)

# Charging Indirect Costs

- Indirect Cost Rate is a maximum percentage grantees do not have to charge the full amount to indirect costs
- Indirect Cost Rates for 21<sup>st</sup> CCLC program:
- LEAs and charter schools NC DPI approved restricted indirect cost rate
- Non-Units State average restricted indirect cost rate
- Indirect Cost Rate can change with each fiscal year
- Rate is not specific to a grant award but to fiscal year so grantees should always use current fiscal year's indirect cost rate when budgeting and charging indirect costs

## Accounting for Indirect Costs

- Indirect costs do not need to be accounted for in the same way as direct costs
- Are not subject to procurement requirements, cash management requirements, time and effort requirements, etc.
- Do have to be allowable as defined in 2 C.F.R. 200.403-404
- Still have to have records to show the amount of indirect costs charged to the grant and the basis for charging that amount
- BAAS includes account codes within budgets that can generate indirect costs which helps LEAs/charters ensure appropriate indirect cost charges
- Non-BAAS grantees should maintain independent documentation that ensures costs are charge at the appropriate rates
- Do still have to be used for costs that benefit the grant program

# Examples of Allowable Indirect Costs

- Facilities Costs
- Utilities
- Telecommunications
- Custodial
- Administration Costs
- Finance/Accounting
- Human Resources
- Administrative/Clerical Staff –

Should be charged as indirect unless 1) integral to project or activity; 2) individuals an be specifically identified with a project or activity; 3) such costs are explicitly included in budget or have prior written approval from DPI; and 4) costs are also not recovered as indirect costs.

 Even for these examples, cannot be for expenses that are otherwise charged as direct costs

## Examples of Unallowable Indirect Costs

- Costs that are completely unassociated with the Federal program
- Example: A 21<sup>st</sup> CCLC grantee operates two after school programs, one funded with 21<sup>st</sup> CCLC and another funded entirely by private donations. Both programs operate at independent and separate facilities. The grantee cannot charge facilities costs for the privately funded program to indirect costs for 21<sup>st</sup> CCLC.
- Project Director or other staff directly involved in the program
- Travel for employees who are paid as a direct cost
- Materials, supplies and equipment purchased directly for use on a specific grant or project

## Conclusion

- Indirect costs are complicated and answers to some questions can often be program-specific and/or organization-specific
- •Being consistent within each organization and program in treating costs as direct vs. indirect is key
- •Ensure that the cost is for an activity that does provide some "benefit" the project or program from which the funding has originated

### Resources

- •Uniform Administrative Requirements, Cost Principles, and Audit Requirements (Uniform Guidance) <u>2 C.F.R. 200</u> (200.412—415, Appendix III -- PSUs, Appendix IV -- Non-Units)
- •Education Department General Administrative Requirements (EDGAR), Part 76 34 C.F.R. 76.560-580
- USED Indirect Cost Group
- •Recently published a useful guidance document titled "Cost Allocation Guide for State and Local Governments"



Melissa Madrid

Grants Accountant NCDPI



#### Public Schools of North Carolina

# Cash Calendar/FRD Dates and ERaCA system

Presentation given by: Melissa Madrid,
Grants Accountant
melissa.madrid@dpi.nc.gov
4/27/2021

## First, let's talk about the Cash \$\$

- DPI processes expenditures each weekday at 3:00 p.m., except for federal and state holidays. All request submitted after 3:00 p.m., will be processed the following day. Also, you cannot submit another request for the same PRC until your first request has been processed.
- The FRD (Funds Requirement Date) that appears on the reimbursement request that is entered to ERaCA, is for LEAs and Charter Schools. Non-LEAs will need to allow 5-7 business days, after reimbursement request entry to ERaCA for deposit of their funds. The 5-7 business days is specific to Non-LEAs.

#### Non-LEA Reimbursement Request Timeline

Non-LEA enters reimbursement request to ERaCA, by 3 p.m.

- Day 1- Report validation start for DPI process
- Day 2- Report is generated and additional verifications are needed in order to complete processing.
- Day 3- Accounts Payables enters reimbursement request in system for payment.
- Day 4- AP check write is completed, and transfer is initiated.
- Day 5- 7- Then depending on the Non-LEAs bank, the funds are made available.

## Very Important!

Non-LEAs who have multiple awards, over different Cohorts-

Please submit your reimbursement documentation to DPI at the same time your reimbursement request is entered to ERaCA. Delays in sending the documentation will delay the processing/approvals and affect the funds deposit.

Email documentation to Richard Trantham and Melissa Madrid.

## Now, let's move on to ERaCA

- Non-LEAs enter reimbursement requests to this system, as well as have access to reports and data inquiry.
- Important Reminders:
  - Make sure your double check your summary on the reimbursement request before hitting the submit button, this includes the using approved budget codes. You will need to ensure that funds are available in those budget codes and the expenditure codes can not be a negative.
  - Make sure to print your data inquiry screen before you submit your reimbursement request so you can submit that with your documentation.

# Important Reminders- Continued-

3. Remember that the reports in ERaCA are not available To-Date and are monthly reports. These reports are updated after data files have been processed, which means the reports will be out and available in ERaCA within the first two weeks of the month, generally between the 7<sup>th</sup> and the 12<sup>th</sup> of the month.

4. Documentation must be submitted on time, which currently is within 10 days\* of reimbursement being submitted. This includes the print screen from ERaCA, all receipts, all invoices, all timesheets, etc. Everything must be signed and dated and must be a true reimbursement, no advances are allowed.

\*same day for multiple Cohort awards

## Questions on Account Code Errors

- So, what happens if a wrong account code is selected on a reimbursement request? Non-LEAs should contact Michael Ray by 2 p.m. to have a wrong reimbursement cancelled, before the 3 p.m. deadline.
- What if the error to the account code is found after the reimbursement has been processed? Then the Non-LEA can make an adjustment on their next entry, a negative amount would be placed on the wrong code and then the correct amount would be placed in the correct account code

## ERaCA Help Tab

- Within ERaCA, there is a Help Tab on the top right, please click on that tab for other common issues and solutions.
- In addition, there are multiple email addresses for the DPI contacts who can help you with any additional questions or issues not addressed in the Help Tab.
- Also, we ask you to refer to the ERaCA User's Guide, for specific step-by-step processes.

# Questions & Answers

Thank you for your time and attention.

Melissa Madrid, Grants Accountant melissa.madrid@dpi.nc.gov





Shirley Mc Fadden Monitoring and
Compliance
Manager, Monitoring
and Compliance
Section, NCDPI

# Fiscal Requirements for North Carolina 21<sup>st</sup> Century Community Learning Centers

Shirley McFadden, CPA, CIA, CGAP
NC DPI Monitoring and Compliance Manager

# Internal Audit Office: Monitoring & Compliance Section

**Annual SAM Compliance** 

Federal Fiscal Reviews

Single Audit Resolution Process

**NC Grant Compliance** 

**Technical and Advisory Services** 

## **Objectives**

- 1. Fiscal Requirements
- 2. Non-Compliance
- 3. Your Role
- 4. DPI Monitoring

#### Annual Requirements:

- System for Award Management (SAM)
- Single Audit Requirements
- NC Grant Requirements

#### Ongoing Requirements:

Uniform Guidance



## Annual Requirement: System for Award Management (SAM)

#### Fiscal Requirements

- · 2 CFR 25
- MUST be registered in SAM to do business with the Federal Government
- MUST re-register annually

#### Non-Compliance

 No new Federal award can be made or financial modification to an existing Federal award until compliant

#### Your Role

- Assignment of Responsibility
- Monitoring Plan
- Documented Policy and Procedures

#### DPI Monitoring and Compliance

- · Reminders:
  - Newsletter
- 30 Day Notice

Common Issues? Changes in personnel and Missed Deadlines



# Annual Requirement: Single Audit Reports

#### Fiscal Requirements

- 2 CFR 200 Subpart F
- A single or program-specific audit
- If \$750,000 or more in Federal awards expended
- Corrective Action Plans
- Findings must be corrected promptly

#### Non-Compliance

- 2 CFR 200.208, 2 CFR 200.339
- Options:
  - Additional fiscal reporting requirements
  - Additional monitoring
  - Require prior approvals
  - Withhold, disallow, or suspend awards
  - Suspension and debarment

#### Your Role

- Assignment of Responsibility to Manage Audit Process
- Audit Plans
- · Board role is clear
- Accountability for Timely Corrections
- Documented Policy and Procedures

#### DPI Monitoring and Compliance

- Audit Resolution Process
- Follow-up to ensure fiscal and compliance findings, relevant to DPI grants, are corrected

Annual Requirement: NC Grant Requirements

	Fiscal
Req	uirements

- NCGS 143C-6-23
- 09 NCAC Subchapter 03M
- Certifications and Reports due in 90 days (after your FY End)
- Single Audits due in 9 months
- See Levels and Specific Requirements in Next Slide

#### Non-Compliance

- OSBM Suspension of Funds List
- No new State or Federal Financial award can be made until compliant

#### Your Role

- Assignment of Responsibility
- Monitoring Plan
- Documented Policy and Procedures

#### DPI Monitoring and Compliance

- · Reminders:
  - Newsletter
  - 90 Day Notice

Common Issues? Changes in personnel



Public Schools of North Carolina

# NC Grant Requirements and Levels

- Certification that State and/or Federal financial assistance used for stated purpose
- 2. An accounting of all **State and/or Federal** financial assistance
- 3. A report on activities and accomplishments undertaken, including required performance measures
- 4. A single or program-specific audit prepared and completed in accordance with Generally Accepted Government Auditing Standards (Yellow Book)

Combined State and/or Federal financial	1	2	3	4
Level I < \$25,000	~	•		
Level II <\$500,000	•	•	~	
Level III >=\$500,000	•	•	~	•

# Ongoing Requirements: Uniform Guidance

Fiscal
Requirements

- 2 CFR 200
  - Cost Principles
  - Procurement Standards
  - Equipment and Inventory
  - Record Retention
  - Conflict of Interest
  - Internal Controls
  - Audit Requirements

#### Non-Compliance

- 2 CFR 200.208, 2 CFR 200.339
- Options:
  - Additional fiscal reporting requirements
  - Additional monitoring
  - Require prior approvals
  - Withhold, disallow, or suspend awards
  - Suspension and debarment

#### Your Role

- Assignment of Responsibility
- Monitoring Plan
- Documented Policy and Procedures

# Federal Programs Monitoring and Compliance

Annual fiscal reviews

Common Issues: Inadequate policies and procedures

Primary Opportunity for Improvement: Documentation to Support Reasonable and Necessary



# Uniform Guidance: Fundamental Requirements of Cost Principles

### Fundamental requirements (2 CFR 200.400):

- efficient and effective administration through sound management practices;
- administering an award in a manner consistent with agreements, program objectives, and the terms and conditions;
- having accounting practices consistent with cost principles in Subpart E;
- documentation supporting all costs

# Uniform Guidance: Factors Affecting Allowability of Costs (200.403)

#### Is cost:

- Necessary and reasonable to achieve program objectives?
- In compliance with limitations these principles and the Federal award?
- Treated like other activities of the non-Federal entity?
- In accordance with generally accepted accounting principles (GAAP)?
- Adequately documented?
- Incurred during the approved budget period?

Note: Cost is not allowed if it is included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program.

# Uniform Guidance: Reasonable Costs (200.404)

A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances...

# Uniform Guidance: Allocable Costs (200.404)

A cost is allocable to a particular Federal award or other cost objective if the goods or services involved are chargeable or assignable to that Federal award or cost objective in accordance with relative benefits received.

# Uniform Guidance: General Provisions for Selected Items of Cost (200.420-200.476)

The allowability of certain items are discussed in this section and it is worth reviewing periodically.

# Uniform Guidance: Written Procedures for Allowability 200.302(b)(7)

Written procedures for determining the allowability of costs in accordance with subpart E of this part and the terms and conditions of the Federal award.

# Uniform Guidance: Internal Controls (200.303)

Establish and maintain effective internal control. These internal controls should be in compliance with:

- "Standards for Internal Control in the Federal Government" issued by the Comptroller General of the United States or
- "Internal Control Integrated Framework", issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

#### Fiscal Compliance:

#### **Annual Requirements:**

- System for Award Management (SAM)
- Single Audit Requirements
- NC Grant Requirements

#### Ongoing Requirements:

Uniform Guidance

#### Your Role:

- Ask Questions
- Ensure policy and procedures exist
- Ensure assignment of responsibility
- Plan to monitor
- Encourage operations management and staff to seek guidance if they have concerns and hold each other accountable

#### Monitoring Compliance:

- Annual Contact
- Newsletter Reminders
- Technical Assistance



**Summary:** 

### Public Schools of North Carolina

# 21<sup>st</sup> CCLC End of Year Due Dates & Day 2 Overview

## Important Dates to Remember

- 3<sup>rd</sup> Installments (waivers) May 14th
- Summer Carry-Over Budget July 23<sup>rd</sup>
- Asset Inventory –June 30<sup>th</sup>
- Summer Basic Info Sheet June 11<sup>th</sup>
- Summer Field Trip Forms 30 days prior
- Annual Program Evaluation- August 31st
- ERaCA final funds request June 23<sup>rd</sup>
- Upcoming Meetings August 17<sup>th</sup> and 18<sup>th</sup>

# Day 2 Overview (AM)

- New GPRA
- 21DC
- Break-Out Sessions

# 10:15 am - 11:00 am Break-Out Sessions

Session A Family Engagement (Megan)

Session B Marketing (Tammorah)

Session C
Summer Programming (Jennifer)

# 11:15 am - 12:00 pm Break-Out Sessions

Session D Virtual Learning (Tara)

Session E Middle/ High School Best Practices (Eric/Sally Fields from CIS of Cape Fear)

Session F School/ Community
Partnerships (Bronica Glover from G.E.P
/ Tammorah)

# Day 2 Overview (PM)

- NC Homeless Education Program
- NC Migrant Education Program
- Regional Meetings

# 2:30-4:00 pm 21<sup>st</sup> CCLC Regional Breakouts w/ Program Administrators

- Session G Northwest/Western/Piedmont-Triad/Southwest Regions (Megan, Tammorah, and Dr. Townsend)
- Session H Southeast/Sandhills Region (Tara and Susan)
- Session I Northeast /North Central Regions (Eric, Jennifer and Alex)

# THAN FOR PARTICIPATING